

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH S. BEALE,)	
)	Case No. 07 CV 6909
Plaintiff,)	
)	Judge Kocoras
v.)	
)	Magistrate Judge Valdez
REVOLUTION PORTFOLIO, LLC, and)	
SECURITY LIFE OF DENVER)	
INSURANCE COMPANY d/b/a/ ING,)	
)	
Defendants.)	
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)	
REVOLUTION PORTFOLIO, LLC,)	
)	
Counter-Plaintiff,)	
)	
v.)	
)	
JOSEPH S. BEALE,)	
)	
Counter-Defendant.)	

NOTICE OF MOTION

To: Matthew P. Connelly Garrett C. Carter Connelly, Roberts & McGivney, LLC 55 W. Monroe St. Suite 1700 Chicago, IL 60603	Christopher B. Lega Reimer & Braunstein, LLP Three Center Plaza 6th Floor Boston, MA 02108	Thomas B. Keegan Edward Gleason Keegan, Laterza, Lofgren & Gleason, LLC 566 W. Adams St. Suite 750 Chicago, IL 60661
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PLEASE TAKE NOTICE that on May 6, 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Charles P. Kocoras, or any judge sitting in his stead, in the United States District Court for the Northern District of Illinois, Room 1725, Chicago,

Illinois, and then and there present Plaintiff's Motion for Leave to File Amended Affirmative Defenses, a copy of which is served upon you herewith.

Respectfully submitted,

JOSEPH S. BEALE

By: /s/ Monte L. Mann
One of His Attorneys

Monte L. Mann
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CERTIFICATE OF SERVICE

Monte L. Mann, an attorney, hereby certifies that, on April 25, 2008, he caused a true and correct copy of the foregoing *Notice of Motion* to be filed electronically with the Court's CM/ECF system, and that notice of this filing was sent by electronic mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to receive electronic filings as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Monte L. Mann

Monte L. Mann